

UNITED STATES DISTRICT COURT
EASTEN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CHRISTOPHER FRANCIS DISPENSA,

Plaintiff,

v.

Case No. 25-12017

Hon. Matthew F. Leitman

Mag. Judge Kimberly G. Altman

JONATHAN DAVID GOOD,

a.k.a. “**JON MOXLEY**”,

an individual, and **ALL ELITE WRESTLING, LLC,**

a Florida corporation;

jointly and severally,

Defendants.

DEFENDANT ALL ELITE WRESTLING, LLC’S ANSWER TO COMPLAINT

Now comes **ALL ELITE WRESTLING, LLC**, only, (**AEW**) by and through its attorneys, **SEWARD HENDERSON PLLC**, and for its Answer to the Complaint states as follows:

1. In answer to paragraph 1, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

2. In answer to paragraph number 2, **AEW** admits that it is a limited liability corporation, and its principal place of business is in Jacksonville, Florida.

In answer to any remaining allegations contained therein, Defendant neither admits

nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

3. In answer to paragraph 3, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

4. In answer to paragraph 4, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

5. In answer to paragraph 5, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

6. In answer to paragraph 6, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

7. In answer to paragraph number 7, AEW acknowledges that Defendant Good performed at the Little Caesar's Arena on May 10, 2023, as part of his contractual obligations. In answer to any remaining allegations contained therein, Defendant neither admits nor denies the allegations contained therein for want of

sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

8. In answer to paragraph 8, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

9. In answer to paragraph 9, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

10. In answer to paragraph 10, Defendant denies this allegation for the reason that it is untrue.

11. In answer to paragraph 11, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

12. In answer to paragraph 12, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

13. In answer to paragraph 13, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

14. In answer to paragraph 14, Defendant denies this allegation for the reason that it is untrue.

15. In answer to paragraph 15, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

**COUNT I: NEGLIGENT HIRING, TRAINING, SUPERVISION, & RETENTION AS
TO DEFENDANT AEW**

16. In answer to paragraph 16, the Defendant hereby incorporates by reference its answers to all preceding paragraphs, as if fully set forth herein.

17. In answer to paragraph 17, including its subparts (a) through (g), Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

18. In answer to paragraph 18, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

19. In answer to paragraph 19, Defendant denies this allegation for the reason that it is untrue.

20. In answer to paragraph 20, Defendant denies this allegation for the reason that it is untrue.

21. In answer to paragraph 21, Defendant denies this allegation for the reason that it is untrue.

22. In answer to paragraph 22, Defendant denies this allegation for the reason that it is untrue.

WHEREFORE, this Defendant prays for a judgment of no cause of action, together with an award of costs, interest and attorney fees in its favor that were wrongfully incurred.

COUNT II: CIVIL ASSAULT & BATTERY AS TO DEFENDANT MOXLEY

23. In answer to paragraph 23, the Defendant hereby incorporates by reference its answers to all preceding paragraphs, as if fully set forth herein.

24. In answer to paragraph 24, Defendant denies this allegation for the reason that it is untrue.

25. In answer to paragraph 25, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

26. In answer to paragraph 26, Defendant denies this allegation for the reason that it is untrue.

27. In answer to paragraph 27, Defendant denies this allegation for the reason that it is untrue.

28. In answer to paragraph 28, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

WHEREFORE, this Defendant prays for a judgment of no cause of action, together with an award of costs, interest and attorney fees in its favor that were wrongfully incurred.

**COUNT III: GENERAL NEGLIGENCE AS TO DEFENDANT MOXLEY AND
DEFENDANT AEW**

29. In answer to paragraph 29, the Defendant hereby incorporates by reference its answers to all preceding paragraphs, as if fully set forth herein.

30. In answer to paragraph 30, Defendant denies this allegation for the reason that it is untrue.

31. In answer to paragraph 31, this Defendant neither admits nor denies that Plaintiff has accurately and fully stated the duties owed to those involved in the presentation, and therefore leaves Plaintiff to his proofs.

32. In answer to paragraph 32, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

33. In answer to paragraph 33, Defendant denies this allegation for the reason that it is untrue.

34. In answer to paragraph 34, Defendant denies this allegation for the reason that it is untrue.

WHEREFORE, this Defendant prays for a judgment of no cause of action, together with an award of costs, interest and attorney fees in its favor that were wrongfully incurred.

**COUNT IV: GROSS NEGLIGENCE AS TO DEFENDANT MOXLEY AND
DEFENDANT AEW**

35. In answer to paragraph 35, the Defendant hereby incorporates by reference its answers to all preceding paragraphs, as if fully set forth herein.

36. In answer to paragraph 36, Defendant denies this allegation for the reason that it is untrue.

37. In answer to paragraph 37, Defendant denies this allegation for the reason that it is untrue.

38. In answer to paragraph 38, Defendant denies this allegation for the reason that it is untrue.

39. In answer to paragraph 39, Defendant denies this allegation for the reason that it is untrue.

WHEREFORE, this Defendant prays for a judgment of no cause of action, together with an award of costs, interest and attorney fees in its favor that were wrongfully incurred.

COUNT V: PREMISES LIABILITY AS TO DEFENDANT AEW

40. In answer to paragraph 40, the Defendant hereby incorporates by reference its answers to all preceding paragraphs, as if fully set forth herein.

41. In answer to paragraph 41, Defendant denies this allegation for the reason that it is untrue.

42. In answer to paragraph 42, Defendant denies this allegation for the reason that it is untrue.

43. In answer to paragraph 43, Defendant denies this allegation for the reason that it is untrue.

44. In answer to paragraph 44, Defendant denies this allegation for the reason that it is untrue.

WHEREFORE, this Defendant prays for a judgment of no cause of action, together with an award of costs, interest and attorney fees in its favor that were wrongfully incurred.

**COUNT VI: *RESPONDEAT SUPERIOR* (VICARIOUS LIABILITY) AS TO
DEFENDANT AEW**

45. In answer to paragraph 45, the Defendant hereby incorporates by reference its answers to all preceding paragraphs, as if fully set forth herein.

46. In answer to paragraph 46, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

47. In answer to paragraph 47, Defendant neither admits nor denies the allegations contained therein for want of sufficient information upon which to form a belief as to the truth of the averments and therefore leaves the Plaintiff to his proof.

48. In answer to paragraph 48, Defendant denies this allegation for the reason that it is untrue.

WHEREFORE, this Defendant prays for a judgment of no cause of action, together with an award of costs, interest and attorney fees in its favor that were wrongfully incurred.

COUNT VII: DAMAGES

49. In answer to paragraph 49, the Defendant hereby incorporates by reference its answers to all preceding paragraphs, as if fully set forth herein.

50. In answer to paragraph 50, including its subparts (A) through (I), Defendant denies this allegation for the reason that it is untrue.

WHEREFORE, this Defendant prays for a judgment of no cause of action, together with an award of costs, interest and attorney fees in its favor that were wrongfully incurred.

Respectfully submitted,

SEWARD HENDERSON PLLC

/s/ T. Joseph Seward (P35095)

Attorneys for Defendant AEW, only

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Dated: July 22, 2025

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a Florida corporation;

jointly and severally,

Defendants.

JURY DEMAND

NOW COMES the Defendant, **ALL ELITE WRESTLING, LLC**, only, by and through their counsel, **SEWARD HENDERSON PLLC**, and hereby demand a trial by jury.

Respectfully submitted,

SEWARD HENDERSON PLLC

/s/ T. Joseph Seward (P35095)

Attorneys for Defendant AEW, only

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DEFENDANT ALL ELITE WRESTLING, LLC’S AFFIRMATIVE DEFENSES

1. That Plaintiff agreed to and accepted his role in the presentation that is the subject of this litigation, and such, cannot claim any damages as a result of what took place.

2. That the Worker’s Compensation Act constitutes a bar for recovery of any and all damages claimed herein.

3. That this claim may be barred by a contract and/or a release.

4. That the allegations of the Complaint are such that a claim for general negligence, gross negligence, premises liability, and *Respondeat Superior* are not appropriate, and should be dismissed.

5. That this matter may be barred by the applicable statute of limitations.
6. That Plaintiff cannot recover exemplary damages.
7. I reserve the right to elicit additional affirmative defenses.

Respectfully submitted,

SEWARD HENDERSON PLLC

/s/ T. Joseph Seward (P35095)

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CERTIFICATE OF SERVICE

I hereby certify that on **Tuesday, July 22, 2025**, I electronically filed the foregoing document with the Clerk of the Court via the CM/ECF system, which will send notice to all parties and attorneys of record.

/s/ Niklas Thomas

SEWARD HENDERSON PLLC